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October 13, 2021

VIA ECF

The Honorable Denise L. Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, Case No. 1:20-cv-706 (DLC)

Dear Judge Cote:

On behalf of Martin Shkreli, I hereby respectfully request permission to file under seal portions of Mr. Shkreli's letter-motion seeking to adjourn the trial date (the "Letter-Motion"), portions of the declaration of Joel A. Sickler (the "Sickler Declaration"), and portions of Exhibit B. Pursuant to the Court's September 17, 2020 Order (ECF No. 261), I respectfully provide the Court with the reason for the requested redactions in the Letter-Motion, the Sickler Declaration, and Exhibit B. The requested redactions contain personal and confidential information pertaining to Mr. Shkreli that is not related to the claims or defenses in this case, has not been released into the public domain, and would be likely to cause significant personal embarrassment if publicly filed. The sealing of this information is necessary to preserve the higher values of protecting personal confidential information of Mr. Shkreli, and thus, sealing the portions of the Letter-Motion, the Sickler Declaration, and Exhibit B is narrowly tailored to achieve the aim of preserving such higher values.

In accordance with Rule 8.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Mr. Shkreli will publicly file the Letter-Motion, the Sickler Declaration, and Exhibit B with the redactions, and on a separate docket entry, Mr. Shkreli will file under seal the unredacted Letter-Motion, Sickler Declaration, and Exhibit B.

Respectfully submitted,

/s/ Christopher H. Casey
Christopher H. Casey